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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA

Plaintiff,

v.

LARRY WAYNE GRANT, III,

Defendant.

Case No. 3:20-cr-00519-HZ

**DECLARATION OF COUNSEL IN
SUPPORT OF MOTION TO
CONTINUE TRIAL DATE**

I, Alison Clark, declare:

1. I am an Assistant Federal Public Defender and counsel of record for Larry Wayne Grant, III.

2. Mr. Grant was arraigned on November 13, 2020, for one count of Failure to Register as a Sex Offender. Mr. Grant is presently out of custody.

3. A continuance of the trial date for at least 60 days is necessary to provide the defense with adequate time to conduct witness interviews, further review discovery materials, engage in plea negotiations if appropriate, and consult with Mr. Grant. The defense also requires

additional time to complete additional research into possible defenses, to research and file appropriate legal motions, and to otherwise prepare for trial.

4. Assistant United States Attorney Thomas Ratcliffe has represented that he has no objection to the requested extension.

5. Defense counsel has spoken with Mr. Grant and explained the bases for requesting a continuance, and the rights that he has under the Speedy Trial Act (18 U.S.C. § 3161(h)(7)(A)). Mr. Grant knowingly and voluntarily waives his rights under the Speedy Trial Act. He respectfully requests that the Court continue his trial date for at least 60 days.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated this 29th day of March 2021.

/s/ Alison M. Clark

Alison M. Clark

Assistant Federal Public Defender